

Daniel M. Hattis (SBN 232141)
Paul Karl Lukacs (SBN 197007)
Che Corrington (admitted *pro hac vice*)
HATTIS & LUKACS
11711 SE 8th St, Ste 120
Bellevue, WA 98005
Telephone: (425) 233-8650
Facsimile: (425) 412-7171
Email: dan@hattislaw.com
Email: pkl@hattislaw.com
Email: che@hattislaw.com

Attorneys for Plaintiffs and the Proposed Class

Crystal Nix-Hines (SBN 326971)
Shon Morgan (SBN 187736)
Marina Lev (SBN 321647)
QUINN EMANUEL URQUHART & SULLIVAN, LLP
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100
Email: crystalnixhines@quinnemanuel.com
Email: shonmorgan@quinnemanuel.com
Email: marinalev@quinnemanuel.com

*Counsel for Defendants Cellco Partnership
d/b/a Verizon Wireless and Verizon Communications Inc.*

[Additional Counsel Listed After Signature Line]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

TERESA MACCLELLAND, *Et Al.*,
For Themselves, As Private Attorneys
General, and On Behalf Of All Others
Similarly Situated,

Plaintiffs,

v.

CELLCO PARTNERSHIP D/B/A VERIZON
WIRELESS; and
VERIZON COMMUNICATIONS INC.,

Defendants.

Case No. 3:21-cv-08592-EMC

**JOINT FURTHER STATUS
CONFERENCE STATEMENT**

[Hon. Edward M. Chen]

Further Status Conference

Date: May 23, 2023

Time: 2:30 p.m.

Courtroom: By Zoom

JOINT FURTHER STATUS CONFERENCE STATEMENT

Plaintiffs Teresa MacClelland, *et al.* (collectively, “Plaintiffs”), and Defendants Cellco Partnership d/b/a Verizon Wireless and Verizon Communications Inc. (collectively, “Verizon”) hereby submit this Joint Further Status Conference Statement:

1. Status of Discovery

The Court most recently convened the parties in this action at the Court’s previous Joint Further Case Management Conference on February 14, 2023. As memorialized in its Civil Minutes following the hearing, the Plaintiffs drafted and served two sets of document requests on Verizon. Verizon has responded to both requests and has produced two rolling productions of documents on February 17, 2023 and April 21, 2023 totaling over 69,000 pages. Verizon has committed to continue its rolling productions of documents on or before June 16, 2023. In addition, the parties are meeting and conferring regarding Verizon’s production of a privilege log.

2. Status of the Appeal from the Order Denying the Motion To Compel Arbitration

On July 12, 2022, Verizon filed a Notice of Appeal (Dkt. No. 54) from this Court’s Order Denying Motion To Compel Arbitration. The Ninth Circuit has docketed the appeal as *MacClelland v. Cellco Partnership*, Case No. 22-16020. The parties have completed briefing on Verizon’s appeal and are awaiting an oral argument date from the Ninth Circuit. Even though oral argument has not yet been scheduled the parties expect oral argument will be conducted sometime during the summer or early fall of 2023 based on proposed dates circulated by the Ninth Circuit.

Dated: May 16, 2023

Respectfully submitted,

DENITTIS OSEFCHEN PRINCE, P.C.

By: /s/ Stephen P. DeNittis

Stephen P. DeNittis, Esq. (admitted *pro hac vice*)

DENITTIS OSEFCHEN PRINCE, P.C.

5 Greentree Centre, Suite 410

525 Route 73 N.

Marlton, New Jersey 08057

1 Telephone: (856) 797-9951
2 Email: sdenittis@denittislaw.com

3 Daniel M. Hattis (SBN 232141)
4 Paul Karl Lukacs (SBN 197007)
5 Che Corrington (admitted *pro hac vice*)
6 HATTIS & LUKACS
7 11711 SE 8th St, Ste 120
8 Bellevue, WA 98005
9 Telephone: (425) 233-8650
10 Facsimile: (425) 412-7171
11 Email: dan@hattislaw.com
12 Email: pkl@hattislaw.com
13 Email: che@hattislaw.com

Attorneys for Plaintiffs and the Proposed Class

10 QUINN EMANUEL URQUHART & SULLIVAN, LLP

11 By: /s/ Crystal Nix-Hines

12 Crystal Nix-Hines (SBN 326971)
13 Shon Morgan (SBN 187736)
14 Marina Lev (SBN 321647)
15 QUINN EMANUEL URQUHART & SULLIVAN, LLP
16 865 S. Figueroa Street, 10th Floor
17 Los Angeles, CA 90017
18 Telephone: (213) 443-3000
19 Facsimile: (213) 443-3100
20 Email: crystalnixhines@quinnemanuel.com
21 Email: shonmorgan@quinnemanuel.com
22 Email: marinalev@quinnemanuel.com

*Counsel for Defendants Cellco Partnership
d/b/a Verizon Wireless and Verizon Communications Inc.*

CERTIFICATION UNDER CIVIL L.R. 5-1(h)(3)

The filer of this document, Paul Karl Lukacs, hereby attests that each of the other signatories has concurred in the filing of this document.

Dated: May 16, 2023

By: /s/ Paul Karl Lukacs